

1 David A. Carroll, Esq. (NSB #7643)
dcarroll@rrsc-law.com
2 Anthony J. DiRaimondo, Esq. (NSB #10875)
adiraimondo@rrsc-law.com
3 **RICE REUTHER SULLIVAN & CARROLL, LLP**
3800 Howard Hughes Parkway, Suite 1200
4 Las Vegas, Nevada 89169
Telephone: (702) 732-9099
5 Facsimile: (702) 732-7110

6 William R. Fried (*Pro Hac Vice*)
wfried@herrick.com
7 Marisa A. Leto (*Pro Hac Vice*)
MLeto@herrick.com
8 **HERRICK FEINSTEIN LLP**
2 Park Avenue
9 New York, New York 10016
Telephone: (212) 592-1400
10 *Attorneys for Plaintiff Jason Halpern*

11
12 **UNITED STATES DISTRICT COURT**
13 **DISTRICT OF NEVADA**

14 JASON HALPERN,
15 Plaintiff,
16 vs.
17 GARY THARALDSON,
18 Defendant.

Case No. 2:15-cv-02037-JCM-GWF

**STIPULATION TO EXTEND TIME
FOR PLAINTIFF TO FILE
OPPOSITION TO MOTION TO
DISMISS (Dkt. # 28) (FIRST
REQUEST) AND [PROPOSED]
ORDER GRANTING EXTENSION OF
TIME**

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21 Pursuant to Local Rule 6-1, Plaintiff Jason Halpern, by and through his undersigned
22 counsel, and Defendant Gary Tharaldson, by and through his undersigned counsel, hereby submit
23 this stipulation to extend Plaintiff's deadline to oppose Defendant's Motion to Dismiss (Dkt. #
24 28), which was filed on November 20, 2015.¹

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28 ¹ For purposes of this Stipulation, Plaintiff Halpern and Defendant Tharaldson is each a
"Party" and collectively referred to herein as the "Parties."

1 The current deadline for Plaintiff to file its Opposition is December 7, 2015. Based on the
2 intervening Thanksgiving holiday and the schedule of Plaintiff's counsel, Plaintiff has requested
3 an extension up to and including December 22, 2015 in order to file its Opposition to Defendant's
4 Motion to Dismiss (Dkt. # 28). No prior extensions have been requested in relation to this
5 deadline. Defendant stipulates and agrees to this extension up to and including December 22,
6 2015.

7 Additionally, based on the intervening Christmas holiday and the schedule of Defendant's
8 counsel, the Parties stipulate and agree that the deadline for Defendant's Reply brief be extended
9 up to and including January 12, 2016.

10 DATED this 4th day of December, 2015.

11 **RICE REUTHER SULLIVAN & CARROLL, LLP**

12 By: /s/ Anthony J. DiRaimondo, Esq.

13 David A. Carroll, Esq. (NSB #7643)
14 Anthony J. DiRaimondo, Esq. (NSB #10875)
15 3800 Howard Hughes Parkway, Suite 1200
16 Las Vegas, Nevada 89169

17 William R. Fried (*Pro Hac Vice*)
18 Marisa A. Leto (*Pro Hac Vice*)
19 Herrick Feinstein LLP
20 2 Park Avenue
21 New York, New York 10016
22 Attorneys for Plaintiff Jason Halpern

23 **HOLLAND & HART LLP**

24 By: /s/ Brian G. Anderson

25 Brian G. Anderson, Esq.
26 Nevada Bar No. 10500
27 9555 Hillwood Drive, 2nd Floor
28 Las Vegas, NV 89134

Matt Smith, Esq. (*Pro Hac Vice*)
Colorado Bar No. 32043
Claire Wells Hanson, Esq. (*Pro Hac Vice Pending*)
Colorado Bar No. 47072
555 Seventeenth Street, Suite 3200
Denver, Colorado 80202
Attorneys for Defendant Gary Tharaldson

ORDER

Having considered the foregoing, and good cause appearing,

IT IS HEREBY ORDERED, ADJUDGED, AND DECREED that the Parties' Stipulation to Extend Time for Plaintiff to File Opposition to Motion to Dismiss (Dkt. # 28) (First Request) is GRANTED.

IT IS SO ORDERED.

DATED December 9, 2015.



U.S. DISTRICT JUDGE

RICE REUTHER SULLIVAN & CARROLL, LLP
3800 Howard Hughes Pkwy, Suite 1200
Las Vegas, Nevada 89169
(702) 732-9099

CERTIFICATE OF SERVICE

Pursuant to Fed.R.Civ.P. 5(b), and Section IV of District of Nevada Electronic Filing Procedures, I certify that I am an employee of Rice Reuther Sullivan & Carroll, LLP, and that a true and correct copy of the **STIPULATION TO EXTEND TIME FOR PLAINTIFF TO FILE OPPOSITION TO MOTION TO DISMISS (Dkt. # 28) (FIRST REQUEST) AND [PROPOSED] ORDER GRANTING EXTENSION OF TIME** was served via electronic service; via CM/ECF, on this 4th day of December, 2015, to the address(es) shown below:

Brian G. Anderson, Esq.
Nevada Bar No. 10500
9555 Hillwood Drive, 2nd Floor
Las Vegas, NV 89134
BGAnderson@hollandhart.com
Attorneys for Defendant Gary Tharaldson

Sent via separate e-mail correspondence to:

Matt Smith, Esq. (*Pro Hac Vice*)
MJSmith@hollandhart.com
Claire Wells Hanson, Esq. (*Pro Hac Vice Penidng*)
cewellshanson@hollandhart.com
555 Seventeenth Street, Suite 3200
Denver, Colorado 80202
Attorneys for Defendant Gary Tharaldson

William R. Fried (*Pro Hac Vice*)
wfried@herrick.com
Marisa A. Leto (*Pro Hac Vice*)
MLeto@herrick.com
HERRICK FEINSTEIN LLP
2 Park Avenue
New York, New York 10016
Telephone: (212) 592-1400
Attorneys for Plaintiff Jason Halpern

/s/ Gayle McCrea
An Employee of Rice Reuther Sullivan & Carroll, LLP